

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

2311 RACING LLC d/b/a 23XI RACING, and  
FRONT ROW MOTORSPORTS, INC.,

Plaintiffs,

v.

NATIONAL ASSOCIATION FOR STOCK  
CAR AUTO RACING, LLC, NASCAR  
HOLDINGS, LLC, NASCAR EVENT  
MANAGEMENT, LLC, and JAMES FRANCE,

Defendants.

No. 3:24-cv-886-KDB-SCR

NASCAR EVENT MANAGEMENT, LLC,

Counter-Plaintiff,

v.

2311 RACING LLC d/b/a 23XI RACING,  
FRONT ROW MOTORSPORTS, INC., and  
CURTIS POLK,

Counter-Defendants.

**NASCAR’S MOTION FOR LEAVE TO AMEND COUNTERCLAIM**

Pursuant to Rules 15 and 16 of the Federal Rules of Civil Procedure, Counter-Plaintiff NASCAR Event Management, LLC (“NASCAR”), by and through its undersigned counsel of record, moves for leave to amend its Counterclaim. Doc. No. 111. NASCAR offers the following in support of this Motion:

1. NASCAR filed its Counterclaim on March 5, 2025. Doc. No. 111.

2. After the deadline for NASCAR to amend its Counterclaim passed, Counterclaim Defendants produced documents that contained new information relevant to NASCAR's Counterclaim.
3. Based on this new information, NASCAR now seeks leave to file an Amended Counterclaim, attached hereto as Exhibit A.
4. Good cause exists for the Court to grant NASCAR's Motion for Leave to Amend Counterclaim.
5. Pursuant to LCvR 7.1(b), Counterclaim Plaintiff's counsel has conferred with Counterclaim Defendants' counsel regarding the instant motion and Counterclaim Defendants' counsel do not consent to NASCAR's Motion for Leave to Amend.
6. In support of this Motion for Leave to Amend Counterclaim, NASCAR respectfully submits the accompanying memorandum of law.

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Dated: April 16, 2025

Respectfully submitted,

By: /s/ Christopher Yates  
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**ARTIFICIAL INTELLIGENCE (AI) CERTIFICATION**

I hereby certify the following:

1. No artificial intelligence was employed in doing the research for the preparation of this document, with the exception of such artificial intelligence embedded in the standard on-line legal research sources Westlaw, Fast Case, and Bloomberg;

2. Every statement and every citation to an authority contained in this document has been checked by an attorney in this case and/or a paralegal working at his/her direction as to the accuracy of the proposition for which it is offered, and the citation to authority provided.

This the 16<sup>th</sup> day of April, 2025.

/s/ Christopher Yates